

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,**

Debtor.

**IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,**

Plaintiff,

v.

**COHMAD SECURITIES CORPORATION,
MAURICE J. COHN, MARCIA B. COHN,
ROBERT JAFFE, ALVIN J. DELAIRE, JR.,
STANLEY MERVIN BERMAN, JONATHAN
GREENBERG, CYRIL JALON, MORTON KURZROK,
LINDA SCHOENHEIMER MCCURDY, RICHARD
SPRING, ROSALIE BUCCELLATO, MILTON S.
COHN, MARILYN COHN, JANE M. DELAIRE A/K/A
JANE DELAIRE HACKETT, CAROLE DELAIRE,
EDWARD H. KOHLSCHREIBERT, EDWARD H
KOHLSCHREIBERSR REV MGT TRUST, GLORIA
KURZROK, JOYCE BERMAN, S & J PARTNERSHIP,
JANET JAFFIN REVOCABLE TRUST, THE SPRING
FAMILY TRUST, JEANNE T. SPRING TRUST, THE
ESTATE OF ELENA JALON, THE JOINT TENANCY
OF PHYLLIS GUENZBURGER AND FABIAN
GUENZBURGER, THE JOINT TENANCY OF
ROBERT PINCHOU AND FABIAN GUENZBURGER,
ELIZABETH M. MOODY,**

Defendants.

SIPA LIQUIDATION

Index No. 08-01789 (BRL)

Adv. Pro. No. 09-01305 (BRL)

FILED
U.S. BANKRUPTCY COURT
2009 AUG 17 P 12:11
S.D. OF N.Y.

**NOTICE OF MOTION PURSUANT TO 28 U.S.C. § 157(d) TO
WITHDRAW THE REFERENCE TO THE BANKRUPTCY COURT**

PLEASE TAKE NOTICE, that upon the supporting memorandum of law and accompanying appendix, defendants Cohmad Securities Corporation, Maurice J. Cohn and Marcia B. Cohn (collectively, the "Moving Defendants"), by and through their attorneys, Vinson

& Elkins L.L.P., will move before the Honorable Louis L. Stanton, United States District Judge, United States District Court, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21C, City of New York, at a date and time to be determined by the Court, for entry of an Order pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure and Rule 5011-1 of the Local Bankruptcy Rules for the Southern District of New York, directing withdrawal of the reference to the United States Bankruptcy Court for the Southern District of New York of the above-captioned adversary proceeding.

Pursuant to Local Rule 1.6(a), please take notice that Moving Defendants believe this matter to be related to *Securities and Exchange Commission v. Cohmad, et al.*, 09 Civ. 5680 (LLS).

PLEASE TAKE FURTHER NOTICE, that a hearing on the Motion shall be scheduled for a date and time to be determined by the Court only in the event that there are timely filed objections to the relief sought in the Motion.

PLEASE TAKE FURTHER NOTICE, that all responses or objections, if any, to the Motion shall be made in writing, shall state with particularity the ground therefore, and shall be filed with the Court (with a courtesy copy delivered to chambers) and served, so as to be actually received, on or before August 31, 2009, by the Moving Defendants' attorneys.

Dated: August 17, 2009

VINSON & ELKINS L.L.P

By: 

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*Attorneys for Defendants Cohmad
Securities Corporation, Marcia B. Cohn,
and Maurice J. Cohn.*